

EXHIBIT B

Scheef & Stone, L.L.P.
500 N. Akard, Suite 2700
Dallas, Texas 75201



INVOICE

Kelly Crawford Receivership – Metals.co

Statement Date: 12/31/2020
Account No. 16125.102
Invoice No. 1008634

Matter 102 - Representation of Receiver

			Hours
10/26/2020	PCL	Communications with A.Spencer and K.Crawford regarding edits to administrative procedures motion, redline same and transmit to A. Spencer, K. Crawford, communications with court clerk regarding notice of withdrawal of show cause motion for individual defendants, communications with K. Crawford and A. Spencer regarding show cause motion withdrawal, Communications with F. McCarthy and K. Crawford regarding Batashvili personal property list, disposition of same and related review of F. McCarthy list of assets and related declaration, communications with T. Tran and K. Crawford regarding notice of stay filings, communication with W. Hester and K. Crawford regarding status and filing of lis lenders notices in Philadelphia, draft notice of withdrawal of show cause motion for Asher and Batashvili, communications with K. Crawford and J. Stafford regarding google declaration communications with M. Eanet and K.Crawford regarding Bayside Metals issues/proposal.	3.50
	MKS	Calls with Investors and prepare notes on information given and questions.	2.80
	WSY	Email correspondence with counsel for TriNet regarding delivery of requested employee payment information and other inquiries and confer with Receiver regarding the same (.5); Email correspondence with counsel for Travelers insurance regarding Bullion Bond (.25).	0.75
	JSS	Draft revised letter to google in light of defendants' reluctance to give individual declarations; draft e-mail responding to opposing counsel's request for clarification regarding same; attention to demand to Intuit/Quickbooks including service of same; inter-office conference with P. Lewis and client regarding same.	2.25
	KEW	Prepare and send letters to former management employees; update call memo with former employees.	1.50
	LMS	Calls with investors; and prepare notes regarding same with James Stafford regarding access to investor files.	3.50
10/27/2020	PCL	Communications with A. Spencer and K. Crawford regarding contempt motion, administrative procedures motion and order, google Declaration issues, revised administrative procedures motion and/or order thereon, communications with W. Hester, K.Crawford, J.Rolls, et al., regarding	



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		Hours
	Philadelphia property/lis pendens notices, communications with D. Spitzer regarding retainer balances, review draft invoice, revised admin motion, communications with F. McCarthy and K.Crawford, regarding personal property, communications with K.Crawford regarding Luxury Leasing issues, conference with M.Eanet and K.Crawford regarding Bayside Metals issues,communications with J. Stafford and K. Crawford regarding Quickbooks access, communications with J. Stafford, and K. Crawford regarding google declarations	4.20
PKJ	Communications with local counsel, Chauvin Kean, regarding filing of pro hac vice motion in Eastern District of Louisiana for purposes of 28 U.S.C §754.	0.20
JSS	Attention to e-mail from Arkansas AG's office; attention to email from California's Dept. of Enforcement division; prepare pro hac vice application; telephone conference with co-defendant in case pending in Kentucky against Metals et al; draft email to co-counsel regarding same; receipt, prepare letter to google regarding demanding access to G-suite; receive, review and analysis of google's subsequent reply; confer with Receiver and respond to google's reply.	2.75
JLR	Interoffice conference with P. Lewis regarding identification and retrieval of mortgage documents on the eighteen (18) Lis Pendens properties in Philadelphia; Attention to emails from K. Crawford and P. Lewis and interoffice conferences with the same regarding the aforementioned Lis Pendens.	0.75
KEW	Telephone conference with Bank of America subpoena department regarding access to bank statements; conference with K. Crawford regarding same.	0.75
DKB	Interoffice conference with P. Lewis regarding process of retrieving mortgage information via deeds of trust in PA.	0.25
MKS	Phone calls with investors regarding questions related to Receivership.	1.20
LMS	Return calls to investors; Email correspondence with Receiver regarding investor questions.	3.50
WSY	Email correspondence with counsel for TriNet to procure retrieval of monies held by TriNet with incumbent review of Court Orders to offer persuasive argument (2); Review of records produced by TriNet related to the payment of Receivership employees (.5); Telephonic and email correspondence with counsel for Travelers related to production of Bullion Bond (.4).	2.90
KEW	Telephone conference with former employee regarding letter he received.	0.40
MHS	Communications with former employees in light of their receipt of letter from Receiver.	1.25
10/28/2020	PCL Communications with T.Carroll and J. Stafford regarding Kentucky metals, communications with A.Spencer regarding google declaration, review communications with F.McCarthy regarding asset list, travel to Los Angeles for various receivership meetings tomorrow (4.00 hr - No Charge).	4.00
JSS	Telephone conference with Joseph Joslin of Arkansas Securities division regarding receivership and proposed order.	0.25
JSS	E-mail communications with Todd Carroll regarding Kentucky complaint and his client and co-defendant with metals et al New Direction.	0.25
DKB	Retrieve Deeds of Trust and Property Values from Philadelphia County Records on 17 properties; begin preparing schedule of properties.	1.00
JSS	Telephone conference with Gena Yoshita of Hawaii's securities branch regarding receivership and claims process.	0.25
MKS	Phone Calls with Investors regarding the Receivership; contact investment companies for additional contact information in preparation to serve letters.	2.90
MHS	Communications with former employees regarding letter they received from	

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		Hours
	Receiver.	0.75
	LMS Return numerous investor calls and make notes regarding calls.	3.25
10/29/2020	PCL Communications with K. Crawford, J. Brandlin, Chase Bank officer, Camden office personal, meeting at Batashvili house with F. McCarthy, meeting with J. Brandlin and potential asset purchaser group at 8383 Wilshire, meeting with [REDACTED] officer to [REDACTED], meet at [REDACTED] to review premises and interview [REDACTED] and return trip to Dallas from Los Angeles (4.00 hrs - No Charge)	4.00
	DKB Continue preparing schedule of PA properties, including values, contracts for sale pending, etc.	1.50
	MKS Serve freeze letters to business entities holding assets subject to Receivership Orders; phones calls with investors to answer any questions regarding the Receivership.	1.60
	MHS Attention to calls from former employees in light of letter from Receiver.	0.50
	LMS Return numerous investor calls and make notes regarding same.	2.50
10/30/2020	PCL Research on Philadelphia properties.	0.80
	JSS Attention to e-mail from Receiver regarding conference call with google; review correspondences including legal arguments in light of same in preparation for call.	1.00
	JSS Communications with team and counsel for Jones Day regarding former employees named in lawsuit as co-defendants with corporate defendants in Alaska securities administrative hearing.	0.50
	PKJ Attend Telephone call with James S. and google's in house counsel regarding google's compliance and cooperation relating to access to Defendants' GSuite account; confer with James S. regarding possible show cause motion against google.	0.75
	MKS Phone calls with Investors regarding the Receivership and next steps; take notes on the same.	2.40
	WSY Email conference with counsel for TriNet regarding whether the company will comply with the Court's Order and turn over monies to the Receiver.	0.25
	MHS Communications from former employees in light of Receiver letter.	0.75
	JSS Telephone conference with google regarding demand for turnover of access to accounts; review and respond to correspondence from Intuit/Quickbooks outside counsel; review and respond to communication from counsel for Alaska State Securities office; confer with Receiver regarding same.	1.50
	LMS Attention to investor calls; Confer with Margaret Shea regarding same	1.50
10/31/2020	PCL Communications with K. Crawford and H. Readshaw regarding expense reimbursement for Luxury Leasing vehicles.	0.50
11/02/2020	PCL Communications with J. Weichert and R. Lavecchia regarding Philadelphia properties and receivership and related research and file review.	1.90
	JSS Complete Application pro hac vice and order granting same for US District Court Case in California; revise Notice of Stay and related receivership regarding same; phone conference with local counsel regarding same.	2.00
	MKS Phone calls with investors regarding the receivership and case status.	1.60
	WSY Email correspondence with counsel for TriNet regarding return or turnover of Receiver's monies and incumbent review of the Consent Order and other relevant documentation.	0.50
	EO Review investor files and work on database and review information and	

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		Hours
	documents seized from office.	4.50
	MHS Communications with former employee regarding letter received from Receiver.	0.50
	KEW Telephone calls with former employees.	0.75
	LMS Attention to messages from investors; Return calls to investors.	3.00
11/03/2020	PCL Communications with H. Readshaw and K. Crawford regarding Luxury Leasing agreement.	0.40
	MKS Update call notes regarding investors; calls with investors regarding the receivership.	2.50
	LMS Attention to investor messages; Return calls; Organize correspondence in preparation to confer with Receiver regarding non-responsive letter recipients.	1.75
11/04/2020	PCL Communications with K. Crawford, J. Buffa, et al., regarding S. Batashvili asset deposition; attend deposition; communications with K. Pergram regarding 8383 Wilshire status.	5.50
	EO Updating investor spreadsheet, created communication log, date of investments, amount of investment, general notes. work on electronic files for each investor.	5.00
	PKJ For purpose of 28 U.S.C. § 754 filing, review Northern District of Oklahoma's Local Rules regarding Pro Hac Vice Admission; Prepare Pro Hac Vice Motion, Application for Pro Hac Vice Motion and Proposed Order; communications with Judge Frissell's clerk regarding said Motion and seeking leave to file motion without designating local counsel, and request for waiver of filing fees.	1.20
	JSS Communications with local counsel regarding filing of Motion to Stay in US Central District of Florida TMTE lawsuit.	0.25
	MKS Send freeze letters to newly discovered potential financial institution involved in the receivership.	0.40
	WSY Continued email conference with counsel for TriNet relating to return of monies held by Receivership Defendants as ordered by the Court, along with reference to pleadings as needed.	0.75
	LMS Draft freeze letter to Pacific Premier Bank; Return investor calls.	1.75
11/05/2020	PCL Communications with K. Crawford, J. Buffa, et al., regarding and attendance at L. Asher asset deposition, communications with A. Spencer, J. Buffa, K. Crawford, et al., regarding case/deposition issues.	5.70
	JSS Attention to e-mails from Indiana Securities office and Mass. Securities office; review agreement proposed by Colorado securities office; attention to file in light of same.	1.00
	JSS Preparation for and attendance of video conference with Colorado AG's Securities office regarding proposed stipulation for injunction.	0.50
	MKS Confer with K. Crawford regarding Defendant's known investment accounts in preparation for deposition.	0.20
	JSS Confer with Receiver regarding google's refusal to provide access to corporate accounts; outline legal issues and strategy to file motion to show cause.	1.50
	EO Work on database of investor for receivership; gather information regarding investors.	5.25
	LMS Return investor calls; Attention to freeze letters that have not been answered by financial institutions and confer with Receiver regarding same.	1.75
11/06/2020	PCL Research regarding Philadelphia properties, review google contempt motion and related communications with K. Crawford and J. Stafford, review initial	

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	report and related communications with K.Crawford regarding same-	1.75
JSS	Draft Motion to Show Cause against Google and Declaration regarding same.	3.00
JLR	Revise Receiver's Emergency Motion for "Show Cause" Hearing to Hold Google, Inc. in Civil Contempt; Provide the same to J. Stafford for final review.	2.75
EO	Work on database of investor for receivership; gather information regarding investors; return calls from investors.	6.00
JLR	Draft Proposed Order for "Show Cause" Hearing as to Google, Inc.	0.25
JSS	Work on Declaration and compile exhibits for Motion to Show cause.	4.00
MKS	Calls with investors regarding Receivership; draft and mail letter to investment company of Defendants.	2.50
JSS	Communications with intuit's outside counsel; review motion to show cause prepared by J. Rolls.	0.40
11/09/2020	MKS Calls with Investors regarding receivership and their questions; fax and email freeze letter to bank.	2.00
	JSS Attention to email from receiver regarding contact with sales force; research and attempt contact with salesforce legal department in light of same to enforce court's order and obtain access to Salesforce accounts; review and modify application for pro hac vice admittance; communications with local counsel regarding same.	1.25
	LMS Attention to investor messages; Return investor calls	0.75
	EO Work on database of investors for receivership; gather information regarding investors; return calls from investors.	3.50
11/10/2020	PCL Communications with J. Stafford and K.Crawford regarding google issues, status ,response and motion to show cause, receipt of Luxury Lease settlement agreement and related communications with K. Crawford, H. Readshaw, et al., communications with J. Stafford and K. Crawford regarding Intuit/Salesforce access, communications with P.Choi regarding G63 disposition status.	3.50
	JLR Research General Counsel contacts at Salesforce.com and Google, Inc; Provide identified contacts and their contact information to J. Stafford for review and use.	1.00
	JSS Several communications with google in light of filing motion to show cause; draft detailed e-mail to google in light of same; draft and send proposed order of show cause for google in light of same; confer with Receiver and co-counsel regarding same.	2.50
	MKS Return investor calls and take notes; mail letters to entities holding accounts of Receiver Defendants; confer with L. Sanderson regarding metals that were not yet delivered to depositories.	4.60
	LMS Draft letters to Charles Schwab, Merrill Lynch, and Morgan Stanley; Confer with Margaret Shea regarding investor call questions; Return calls to investors.	2.25
	JSS Draft second demand letter to Salesforce and send to legal executives in light of same; telephone conference with counsel for Salesforce in light of same; receive and review access link and communicate issues with same.	0.75
	JSS Inter-office conference with Receiver regarding depositions of defendants; research and discover potential additional evidence in light of defendants admission that information was stored on Amazon cloud services; draft demand letter in light of same.	1.00
	WSY Additional correspondence with counsel for TriNet and reference to court documents buttressing those demands.	0.50

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			Hours
11/11/2020	PCL	Communications with K.Crawford regarding [REDACTED], communications with K.Crawford and/or J.Stafford regarding Google , Intuit issues, response and/or strategy, communications with T.Carroll and J. Stafford regarding Kentucky removal issues.	2.75
	MKS	Calls with Investors and take notes; draft and mail letters to financial institution and business entity subject to Receivership Orders who have not responded; confer with L. Sanderson regarding the same; confer with K. Crawford regarding Receivership Defendant's [REDACTED].	2.80
	MHS	Review employment claim of former employee received from Kelly Crawford; conference with Kelly Crawford regarding same.	0.30
	LMS	Return investor calls; Prepare notes regarding investor calls; Email correspondence regarding freeze letters to be sent; Confer with Margaret Shea regarding investor communications.	2.50
11/12/2020	PCL	Communications with T. Carroll and J. Stafford regarding Chase Metals removal request, communications with A. Bush, H.Readshaw, J.Brandlin,K. Crawford, et al., regarding Luxury Leasing release agreement regarding lease car retrieval reimbursement agreement, communications with M. Eanet ,K.Crawford regarding stat metal return, issues and response.	2.50
	MKS	Calls with Investors regarding the Receivership and take notes; confer with L. Sanderson and K. Crawford regarding investor calls and strategy.	0.80
	LMS	Return investor calls and make notes regarding same; Prepare correspondence regarding unanswered freeze letters	2.75
	PKJ	For 28 U.S.C. §754 filing Communications with local counsel in Eastern Dist. of Louisiana regarding certificate of good standing for purpose of Pro Hac Vice Motion.	0.30
11/13/2020	PCL	Communications with M. Keyes and/or K. Crawford regarding Barrick Capital domain issues and related file review, communications with. K. Crawford regarding reinstatement of various entities identified by G. Norris,communications with Crawford regarding filing motion to show cause regarding Intuit/Quickbooks, communications with J. Buffa, K. Crawford , et al., regarding BOA, communications with A.Bush regarding Luxury Lease/J.Brandlin follow up,, communications with K. Crawford and J. Stafford regarding Salesforce, communications with J. Stafford and K.Crawford regarding google issues and responses and related file review.	4.00
	JLR	Draft Receiver's Emergency Motion for "Show Cause" Hearing to Hold Intuit, Inc. d/b/a QuickBooks in Civil Contempt.	2.00
	JLR	Draft Declaration of Receiver Kelly Crawford corresponding to Receiver's Emergency Motion for "Show Cause" Hearing to hold Intuit, Inc. d/b/a QuickBooks in Civil Contempt.	0.75
	JLR	Draft Proposed Order for "Show Cause" Hearing as to Intuit, Inc. d/b/a QuickBooks corresponding to Receiver's Emergency Motion for "Show Cause" Hearing to hold Intuit, Inc. d/b/a QuickBooks in Civil Contempt.	0.25
	JSS	Review,analyze and revise Colorado state securities stipulation for permanent injunction.	0.60
	JSS	Draft Notice of Stay in the Kentucky matter and Arbitration matter related to Zeitler.	1.00
	MKS	Calls with Investors and take notes regarding Receivership; emails with Investors regarding metals not in depository; confer with L. Sanderson regarding the same.	1.40
	MHS	Conference with James Stafford regarding employment issues including ADR	

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			Hours
		claims.	0.50
11/16/2020	JSS	Telephone conference with outside counsel for google; confer with Receiver regarding same.	0.50
	JLR	Perform calculations of spreadsheet consisting of the pending orders for the following: Barrick Capital, USA Mint, Metals.com, Newmont, Glencore, and Northwest Finance; Provide totals to K. Crawford.	1.75
	MKS	Phone calls with Investors regarding investor letter, case status and metals that are with wholesaler.	1.20
	WSY	Confer with Kelly Crawford regarding art assets found in office of Receivership Entities, Research the origin and potential value of these pieces, and begin preparations for a valuation of the same.	1.00
	JSS	Second phone conference with outside counsel for google regarding Google's legal positions and potential conferral on alternative to litigation to resolve google's legal positions.	1.00
	JSS	Draft email communication to Intuit regarding final demand for receipt of Receivership assets.	0.25
	EO	Review boxes of documents seized from defendants for information regarding assets.	4.00
	LMS	Return investor calls; Update call log; Confer regarding additional letters to be sent from Receiver; Draft follow up letters to financial institutions	3.25
	PKJ	Attend telephone conference with James Stafford and counsel for google and confer with James Stafford regarding same.	0.50
	PCL	Communications with K.Crawford, et al., regarding BOA account issues an related document review, communications with K. Crawford, J. Stafford and H. Schottlaender regarding google access issues and related file review, communications with K. Crawford regarding Basquiat artwork, communications with K. Crawford regarding contempt motion issues and related file review, communications with and K. Crawford and/or D. Baer regarding Philadelphia properties,communications with K.Pergram, S. Pavlovski and/or K. Crawford regarding 8383 Wilshire rent and security deposit issues, communications with K. Crawford regarding BOA developments.	3.20
11/17/2020	JSS	Telephone conference with Receiver and P. Lewis. regarding google's position in objecting to granting the Receiver access to the corporate google Suite accounts; analyze case law in light of same; prepare research assignments and confer/assign tasks to associates.	2.50
	JLR	Begin extensive federal case law research on two questions: (3) a receiver's access to cloud-based platforms and (2) a receiver's ability to step into the shoes of the entity thereby authorizing third parties to treat receiver as the entity; and (3) a court's ability to compel a CEO for a show cause hearing for actions of its entity.	2.25
	JLR	Research and call identified office liquidator companies based in Los Angeles regarding the proposed office property.	1.00
	WSY	Confer with counsel for TriNet concerning handover of funds to Receiver with reference to the SRO.	0.50
	MKS	Calls with Investors regarding metals located at wholesaler; confer with K. Crawford regarding same issue.	1.00
	JLR	Interoffice conference with J. Stafford and P. Jesani regarding J. Stafford's 11/16 conference call with google's local counsel, and discuss need for additional research and briefing regarding the same.	1.50

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		Hours
	PKJ Research issue of actual consent exception to the Stored Communication Act and whether google has the discretion to grant subscriber content to its subscriber, irrespective of the subscriber's consent directing the same.	2.80
	EO Review additional boxes of documents seized from defendants for information regarding assets.	3.25
	PKJ Confer with James Stafford and Jessica Rolls regarding conference call with Google's local counsel, to discuss arguments to be raised in support of Show Cause Motion against google and additional research to be conducted with respect to same.	1.50
	JLR Interoffice conference with J. Stafford and P. Jesani regarding J. Stafford's 11/16 conference with google, discuss the need for responsive research and briefing.	1.50
	PCL Communications with K.Crawford, F. Williams, A. Greene, et al., regarding BOA account issues an related document review; communications with K. Crawford, J. Stafford and H. Schottlaender regarding google access issues ,communications with K. Crawford , K. Pergram, et al., regarding 8383 Wilshire security deposit and/or rent issues and related file review, communications with K. Crawford regarding sale of office assets, communications with J. Stafford, follow up communications with M. Keyes regarding Barrick Capital domain issues, communications with ██████████ regarding ██████████ and instruction on ██████████	3.50
11/18/2020	MKS Confer with L. Sanderson regarding Investor calls.	0.20
	WSY Confer with art appraiser regarding art items held by Receiver and cost of valuing the same.	0.25
	JLR Receipt and review of an email from N. Sinclair at CA Office Liquidators regarding the sale of office property; Draft and send responsive email to N. Sinclair apprising him of the status of the same as well as obtaining photos of the property necessary for sale.	0.25
	LMS Return investor calls; Record notes regarding same	1.20
	PCL Review D. Baer email regarding Philadelphia properties and related research regarding status of all Philadelphia properties and related file review.	1.50
11/19/2020	EO Research to locate contact information for each investor. Complete inventory/index of Defendants' employees and offices; Review e-mail communications relating to investor communications and updated investor master spread sheet.	4.00
	MKS Return investor calls regarding case status; confer with K. Crawford regarding metals located at wholesaler.	1.70
	PCL Communications with K.Crawford, J. Buffa, et al., regarding BOA developments, various communications with K. Crawford and/or to A. Spencer regarding proposed resolution of Asher and Batashvili objection to motion to approve administrative procedures, related review of objection and draft outline of proposed consent resolution, communications with J. Stafford and/or K.Crawford regarding google status,google access issues uncovered, google resistance to court orders and related google access declarations as well subpoena issues ,communications with Attorney ██████████ regarding freeze letter received by IQ Consulting and related communications with K.Crawford regarding same, meet and confer with A. Spencer, K. Crawford, J. Buffa, R. Foelber regarding BOA fund, email communications with S. Pavlovski, K.Pergrem and K. Crawford regarding 8383 Wilshire rent and security deposit	

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		issues, communications with K.Crawford and D. Spitzer regarding claim/notice issues.	Hours
			4.00
11/20/2020	MKS	Return calls with investors regarding case status.	1.20
	EO	Communicating with CFTC in Washington regarding investor database.	2.00
	EO	Returned calls from investors to confirm receipt of documents they sent to Dallas office, explained overall claim process and provided an approx date of when claim process should begin.	2.50
	PCL	Telephone conversation with L. Thompson regarding Philadelphia properties she is broker for Roosevelt St properties and current status, draft related email transmitting SRO, consent orders and related instructions and related research; email communications with A. Spencer following up on proposed consent order on motion to approve administrative procedures, review status of google response to show cause motion, review Asher and Batashvili google declarations and P.Jesani research on SCA consent exception, communications with K.Crawford, J. Stafford and P. Jesani regarding same, docket deadline for reply response to Asher and Batashvili objection to administrative procedures motion and related communications with K. Crawford, review of Receiver's Fee Application and/or communications with K. Crawford regarding same, draft proposed consent order on Receiver's administrative procedures motion.	3.90
11/21/2020	PCL	Begin review of Asher deposition, review/ revised proposed consent order on administrative procedures motion and related communications with K. Crawford and/or A. Spencer	1.25
11/22/2020	PKJ	Telephone conference with Peter Lewis regarding analysis of consent exception to Secured Communications Act, and interpretation of case holding in preparation of briefing for Show Cause Motion against google.	0.30
	PCL	Review/ revised proposed consent order on administrative procedures motion and related communications with K. Crawford and/or A. Spencer, begin preparation of status list, review recent decision on SCA consent exception, communications with J. Stafford.	1.75
11/23/2020	EO	Telephone conference with CFTC regarding investor database updates.	1.50
	MKS	Return calls with investors regarding case status and questions.	0.90
	WSY	Review quotation for art valuation and relay information to Receiver..	0.25
	PKJ	Review cases for purpose of analyzing consent exception to Secured Communications Act, in preparation for briefing on Show Cause Motion against Google.	0.90
11/24/2020	JLR	Receipt and review of email from office liquidating company in response to the Receiver's proposed sale of the 245 Herman Miller chairs; Draft and send responsive email to the same; Forward the same to K. Crawford.	0.25
	WSY	Strategy conference regarding Show Cause Motion and Responses thereto with respect to access to Google drives.	1.00
	MKS	Return phone calls of investors regarding case status and other questions.	1.30
	PKJ	Attend strategy conference call with Kelly Crawford; Peter Lewis; and James Stafford regarding analysis of Negro Case and its application to the consent exception to the SCA, in preparation for drafting brief in support of Show Cause Motion against Google.	0.75
	PKJ	Working on preparing outline of arguments for Reply briefing on Rule to Show	

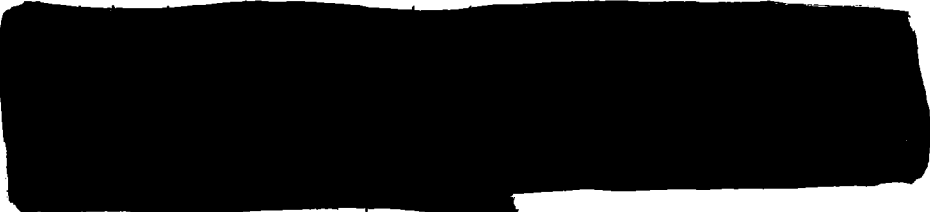


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			Hours
		Cause Motion against Google.	1.00
11/25/2020	MKS	Calls with investors regarding case status and to answer questions.	0.60
	PKJ	Review Receiver's Emergency Motion for Show Cause Hearing to Hold Google Inc. in Civil Contempt; review Google's Letter of October 7, 2020; review caselaw cited by Google in its letter and research any cases distinguishing the cases relied on by Google; conduct research on issue of whether the Order appointing receiver (SRO) defeats the disclosure limitations under the Secured Communications Act for purpose of preparing outline for Brief in support of Motion for Show Cause against Google.	4.70
	LMS	Return investor calls; Attention to emails regarding same	0.50
11/26/2020	PCL	Review caselaw regarding Lucas contempt motion and related communications with K. Crawford.	0.75
11/27/2020	WSY	Review Motion to Show Cause against Google, LLC and Google's Correspondence on that issue (1.5); Begin research under the Secured Communications Act for applicable case law to disarm Google's argument that the consent provided is insufficient as lawful consent (1.75).	3.25
	PKJ	Continued researching issue of whether the SRO order trumps the Secured Communications Act and whether a Receiver steps into the shoes of a subscriber for purposes of satisfying the consent exception under the SCA; review and analysis of Konop v. Hawaiian Airlines case and Federal Trade Commission v. Ameridebt Inc. case.; review cases relating to issue of consent under Sec. 2702 of the SCA (voluntary disclosure of customer communications).	4.00
11/28/2020	WSY	Complete initial research regarding what constitutes lawful consent under the Secured Communications Act, outline all findings, and present the issue to Receivership Team for their comment and review.	2.75
	PKJ	Continued researching issue of whether a Receiver steps into the shoes of a subscriber for purposes of satisfying the consent exception under the SCA; research on issue of whether the Defendants' declarations can qualify as legal consent under the SCA; review and analysis of In re. Ex Parte Application of Tatiana Akhmedova case; confer with co-counsel regarding implication of the court's decision that consent does not have to be communicated in the manner Google prescribes.	2.00
	PCL	Review W.Young research regarding Google contempt issues and related communications with W.Young, P.Jesani, J. Stafford and K.Crawford regarding same and begin preparation for upcoming asher and Google contempt motion.	1.50
11/30/2020	JSS	Telephone conference with Illinois Securities' Department regarding notification of stay and receivership and potential third party MAB attempting to contact investors; confer with L. Sanderson regarding claims process.	0.75
	MKS	Return calls with investors and potential investors to answer questions and gather contact information; confer with K. Crawford regarding potential investor with unknown entity.	1.50
	JSS	Telephone conference with co-counsel to prepare reply to brief; review November 24th case filed in US District Court, Northern District of California regarding legal consent.	1.50
	WSY	Confer with counsel for Receiver regarding strategy for Reply Brief regarding	

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		Hours
	Google LLC's refusal to provide access to Receivership Entity's files and necessary logistics of presenting said arguments at Hearing.	0.80
JSS	Attend Status Conference Hearing in Alaska Securities Administrative matter.	0.75
PKJ	Telephone conference with counsel for Receiver regarding preparation for drafting Brief in support of Motion for Show Cause against Google and address arguments to be raised in the Brief; continued review of cases in support of arguments to be raised in brief; begin preparation for drafting brief.	3.75
LMS	Return investor calls.	0.50
PCL	Begin preparation for upcoming motion for contempt hearings and related communications with K.Crawford, J.Stafford, P.Jesani, W.Young, J.Buffa,R.Foelber ,et al., communications with P. Choi, K.Crawford, regarding G 63, communications with First Legal,M.Molino et al regarding Los Angeles service needs and related file review and research.	6.25
12/01/2020	JSS Communications with counsel for Defendants in light of password turnover to access google suite account for tower equity.com domain; confer with forensics consultant in light of same and conduct initial review of audit logs and account access; multiple phone conferences with Receiver and P. Lewis in light of same.	4.25
JSS	Telephone conference with MA AG's office regarding proposed settlement offer.	0.25
MKS	Return calls with investors to answer questions regarding case status and receipt of letters; confer with M. Crawford regarding metals still with wholesaler.	0.70
JSS	Review Google's response to Receiver's Motion to Show Cause; phone conference with Receiver and P. Lewis regarding same.	0.75
WSY	Review Motion for Show Cause against Lucas Asher and Appendix in support thereof in order to prepare to assist with Powerpoint for hearing (1.5); Draft Trial Subpoena against Lucas Asher (.5).	2.00
EO	Return calls with investors that have not received correspondence from our office.	2.50
PKJ	Continued working on preparing brief in support of Show Cause Motion against Google, including review of caselaw relating to consent exception to SCA; review communications with James Stafford and counsel for Defendants regarding access to Towerequity email accounts; review communications with opposing counsel regarding continuance of Show Cause hearing and analysis of recent supporting caselaw.	1.50
PCL	Communications with K.Crawford, J.Stafford, A.Spencer, J. Buffa, et al., regarding google account access status and strategy, forensics communications with M. Molina, K.Crawford , et al.,regarding [REDACTED] [REDACTED] review Google response to contempt motion and Asher response to contempt motion and related research, file review and communications with K.Crawford, J.Stafford, P.Jesani and/or W.Young and/or Google counsel regarding same and hearing Friday, and preparation for contempt hearings on Friday.	8.75
12/02/2020	JSS Communications with P. Lewis and W. Young regarding motion for continuance of hearing regarding Motion to Show Cause against Google; send draft pleading to W. Young in light of same.	0.50
JSS	E-mail communications with assistant AG's office for State of Arkansas regarding proposed agreed consent order.	0.25
JSS	Conferral with Google regarding position on motion to show cause; revise	

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		motion in light of same and file.	Hours 0.25
	WSY	Prepare Motion for Continuance of Hearing on Show Cause Motion against Google LLC (1.2); Research whether certain entities and persons were listed in the Receivership Entities' payroll (.4); Confer with Receiver's Counsel regarding preparation for Hearing on Show Cause Motion against Lucas Asher, including preparation of Powerpoint and technical logistics with the Court (.8).	2.40
	MKS	Return calls with Investors regarding metals located at wholesaler.	0.10
	EO	Review Asher's video deposition taken on November 5, 2020 Trimming first portion of Asher's video deposition in support of Receiver's argument 1-7 made in Receiver's Motion for "Show Cause" Hearing and Brief in Support.	2.00
	PCL	Continue preparation for Lucas Asher and/or Google contempt motion hearing and/motion for continuance on Google contempt motion, Asher appearance issues/strategy and order, Google account access, related communications with W. Young, A. Spencer, K. Crawford, J. Buffa, H. Schottlander, J. Stafford, R. Foelber, P. Jesani, M. Goode, et al. and related file review-	8.75
12/03/2020	MKS	Return investor calls regarding the receivership and case status.	0.40
	WSY	Review Show Cause Motion and Appendix in Support in order to prepare for Show Cause Hearing in order to prepare for the same (2); Complete Powerpoint in preparation of for Hearing with attention to audio files that needed to be reviewed, edited, and inserted into powerpoint, as well as other revisions to ensure to that presentation aligned with and complimented argument to be made at Hearing (4); Create six Binders for Hearing with individual items to the appendix individually marked to allow for quick recall at Hearing (3).	7.00
	PKJ	Conduct research and review/analysis of caselaw on multiple issues in preparation for hearing on Show Cause Motion against Asher, including: 	5.75
	PCL	Continue preparation for Lucas Asher and/or Google contempt motion hearing, related preparation/revision/review of direct exam/cross exam scripts, opening argument, file materials, and/or proposed exhibits related communications with A. Spencer, K. Crawford, W. Young, J. Buffa, R. Foelber, J. Stafford, P. Jesani, M. Goode, et al., regarding same	12.25
12/04/2020	JSS	Prepare for hearing regarding google's contempt of the court order, and appearance at same.	2.00
	JLR	Perform case law research for J. Stafford regarding  	1.00
	MKS	Return investor calls regarding case status; review freeze letters already sent and compare with business entities disclosed in deposition of defendant; confer with L. Sanderson and K. Crawford on the same.	0.80
	WSY	Prepare for Hearing and rehearse presentation with Peter Lewis and Kelly Crawford, attend and participate in six hour Hearing, and confer and opposing counsel and law enforcement personnel afterwards.	9.00

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		Hours
	PCL Preparation for and attendance at hearing on motion to hold Lucas Asher and potential hearing on Google motion for contempt/withdrawal or continuance of google contempt motion, related communications with A. Spencer, K. Crawford, W. Young, J. Buffa, R. Foelber, J. Stafford, P. Jesani, J. Brown, et al., regarding same.	8.50
12/07/2020	WSY Draft Notice of Subpoena Duces Tecum for Athena Hunter and send to Receiver for his review.	1.30
	EO Continue work on investor database.	3.50
	PCL Communications with K. Crawford, et al., regarding 8383 Wilshire landlord rent claim position, communications with K. Crawford, J. Buffa, R. Foelber, G. Seabolt, et al. regarding Talent Writers position regarding the \$300K BOA transfer, contempt hearing issues, communications with W. Young, K. Crawford regarding Deposition Notice and subpoena and related file review for A. Hunter.	4.25
12/08/2020	JSS Review, revise Colorado proposed consent order and send to receiver; email communications with counsel for Colorado AG's office regarding same.	0.50
	PKJ Conduct research on the issue of whether [REDACTED]	1.00
12/09/2020	MKS Return investor voicemails regarding receivership case status and to obtain contract information; review documents provided by Investor and confer with K. Crawford regarding the same; confer with L. Olivarez regarding investor letters.	2.20
	WSY Compile transcript of Athena Hunter Audio and draft Cover Letter introducing the same for filing with the Court (1); Confer with Art Appraiser regarding pricing for evaluation (.6).	1.60
	EO Verify contact information for investors, update the investor database.	2.25
	PCL Continued communications with W. Young, A. Spencer, K. Crawford, J. Brown, J. Buffa, G. Seabolt, R. Foelber, et al., regarding Hunter deposition, Asher contempt hearing, return of Talent Writers funds, preparation for potential Hunter deposition and related issues and related file review and research.	4.75
12/10/2020	JLR Contact various California Liquidation companies for potential inspection and sale of receiver office furniture; Draft responsive emails to the same providing inspection details and photographs of the furniture.	2.50
	WSY Confer with Kelly Crawford, Will Hester, and Art-Appraiser with regard to cost and logistics of effectuating appraisal (.4); Confer with James Stafford regarding location of document recording inventory of all Apple computers located at site (.1).	0.50
	EO Telephone conference with Mike Snider with Signature Bank regarding: our request for bank records.	0.25
	LMS Return investor call; Confer with Margaret Shea regarding same; Confer with Receiver regarding investor communications	1.00
	PCL Communications with K. Crawford, A. Spencer, J. Buffa, R. Foelber, J. Rolls, J. Genish, E. Medina, P. Choi, et al regarding agreed order on Asher contempt motion, return of Talent Writers funds, sale of Wilshire furniture, Barrick Capital name issues, G63 sale and related file review and research.	3.75

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		Hours
12/11/2020	JLR Return phone call of individual interested in the potential purchase of a Tower Equity, LLC property in Philadelphia, PA; Speak with individual regarding the same.	0.25
	MKS Confer with L. Sanderson regarding investor calls; return messages left by investors regarding case status and investor letters.	1.00
	WSY Research [REDACTED] (1.4); Resolve art appraiser engagement and send pictures to appraiser of relevant artwork (.5); Confer with counsel for payroll processing company, Tri-Net, regarding return of monies (.3).	2.20
	LMS Return investor calls; Confer via email with team regarding investor call procedures	0.50
	PCL Communications with K. Crawford, A. Spencer, J. Buffa, R. Foelber, J. Rolls, J. Stafford, W. Young, p. Choi, et al., regarding regarding agreed order on Asher contempt motion list of bank account issues, return of Talent Writers funds, sale of Wilshire furniture, response to landlord on 8383 rent claim, sale of G63 issues, and related file review and research.	2.25
12/13/2020	MKS Telephone call with investor regarding receivership.	0.30
12/14/2020	MKS Return phone calls with investors regarding case status and take notes on the same.	1.60
	JLR Receipt and review of email from K. Crawford regarding inspection information for office liquidation companies; Draft and send responsive email answering the same.	0.25
	JLR Draft email to, J. Sinclair, confirming his attendance at the 12/15 office furniture inspection; Receipt and review of J. Sinclair's confirmation response to the same.	0.25
	JLR Receipt and review of email from R. Miramontes of Office Liquidation confirming attendance at office furniture inspection; Draft and send responsive email confirming the same.	0.25
	JLR Telephone call with S. Storey, an office liquidator lead provided by a P. Lewis contact; Subsequent telephone call with an additional office liquidation company, P. Austin of Green Cube; Draft informative email to P. Austin providing photos of the office equipment/furniture and provide 12/15 inspection details.	0.50
	JSS Communications with receiver regarding status of demand on Intuit/QuickBook account access; telephone conference with IT expert regarding computer forensics and resale; confer with Receiver regarding same.	0.50
	JLR Receipt and review of responsive email from P. Austin of the office liquidating company, Green Cube, wherein he confirms his attendance of the 12/15 office furniture/equipment inspection; Draft responsive email to the same and advise as to his inspection questions; Email to K. Crawford regarding the same.	0.25
	WSY Complete research regarding the sale of goods issue with respect to coins being held by third-party and Receiver's entitlement to the same.	0.80
	PCL Review of proposed agreed order on motion for contempt and related communications with K. Crawford, A. Spencer, R. Foelber, J. Buffa, communications with R. Lavecchia, L. Thompson, J. Benson and K. Crawford regarding Philadelphia properties information request and follow up, additional communications with J. Rolls, K. Crawford, J. Genish, et al., regarding potential purchasers for 8383 furniture et al., review D. Bleeden documents	

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		and related communications with K. Crawford, J. Buffa and T. Foelber.	Hours 1.50
12/15/2020	JLR	Respond to and draft responsive emails addressing questions with the present inspection of furniture and office equipment; Telephone call with J. Samore, individual overseeing the inspection, to check the status of the inspection and seek extension; Telephone call with R. Miramontes to address inspection question and extension of inspection time.	0.50
	MKS	Return phone calls with investors regarding case status, investor letter, and metals that have not been delivered; confer with L. Sanderson, E. Olivarez, and L. Thompson regarding strategy for collecting investor information.	2.80
	WSY	Confer extensively with art appraiser regarding quality of photos necessary to remotely appraise the pieces and send requisite information to appraiser for its review and confirm agreement to appraise the same.	0.90
	EO	Returned investors calls, telephone conference regarding case status, Calls with investors to discuss questions and making notes.	3.50
	JLR	Receipt and review of multiple emails from K. Crawford and P. Lewis regarding scheduling of additional inspection by P. Lewis contacts of office furniture and equipment; Draft and send emails responsive to the same; Draft and send email to P. Lewis contact to schedule inspection of office furniture and equipment.	0.50
	LMS	Return investor calls; Telephone conference call with team members regarding best practices and procedures for capturing investor information; Email correspondence regarding same	2.75
	PCL	Communications with D. Spitzer, K.Crawford, C.Woo regarding Spitzer withdrawal from TMTE cases and follow up communications with J.Rolls,J.Samore,K.Crawford, et al. regarding furniture inspection; communications with A. Spencer, K. Crawford, M. Goode, J. Buffa, R.Foelber, C. Cella et al, regarding agreed order on motion for contempt and hearing status, and related file review.	1.75
12/16/2020	JLR	Receipt and review of multiple emails from individuals/companies who attended office furniture/equipment inspection; Draft and send responsive emails to the same answering questions as to preparing and submitting respective bids for the office furniture/equipment; Draft and send email to K. Crawford regarding the same; Receipt and review of email from another potential individual interested in scheduling an inspection of the office furniture/equipment; Draft and send responsive email to the same; Draft and send email to J. Samore the california contact to ascertain his availability to oversee the requested inspection; conference with K. Crawford regarding the form of proposals desired; Draft and send email to potential purchaser to inform him of the proposal types requested by K. Crawford for submission and consideration.	0.75
	MKS	Return investor calls and emails regarding metals located at Bayside Metals.	0.70
	LMS	Return investor calls.	1.50
	EO	Analyzing investor files scanning documents and creating both hard files and electronic files.	5.25
	PCL	Draft/receive emails to/from J. Rolls, J.Samore, T. Arons. et al., , regarding inspection logistics for 8383 Wilshire furniture, et al., , draft/receive emails to/from K.Crawford regarding `Philadelphia properties, 8383 Wilshire landlord negotiations and security deposit.	1.50
12/17/2020	MKS	Return investor voicemails regarding case status and metals that were never	

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			Hours	
		delivered and may be with Bayside; confer with K. Crawford regarding investor wanting money from her "account" with Defendants.	1.00	
	LMS	Return investor calls; Confer with Receiver regarding "in-process" transactions and investor options regarding same	1.00	
	PCL	Email exchanges with T. Arons, et al., regarding inspection logistics.	0.30	
12/18/2020	MKS	Phone call with investor regarding case status and ability to sell metals without affecting her claim.	0.30	
	PCL	Telephone conversation with M. Iannu regarding Philadelphia properties and related file review (.75)email exchange with K. Crawford regarding sources of recovery and related file review (.5); draft/receive email from P. Choi regarding certificate of title amendment steps(.25)-1.5	1.50	
12/21/2020	MKS	Return investor phone calls regarding case status and obtain general information and take notes; confer with L. Sanderson regarding messages.	0.80	
		For Current Services Rendered	443.10	129,079.50

Recapitulation

<u>Timekeeper</u>	<u>Hours</u>	<u>Hourly Rate</u>	<u>Total</u>
Priya K. Jesani	32.90	\$270.00	\$8,883.00
Walker S. Young	43.15	240.00	10,356.00
Margaret K. Shea	52.00	200.00	10,400.00
Mark Simon	4.55	435.00	1,979.25
Leslie Sanderson	42.95	305.00	13,099.75
Deb Baxter	2.75	125.00	343.75
Jessica L. Rolls	23.25	200.00	4,650.00
James Stafford	45.00	300.00	13,500.00
Katherine Whitlock	3.40	200.00	680.00
Elizabeth Olivarez	60.75	125.00	7,593.75
Peter Lewis	132.40	435.00	57,594.00

09/29/2020	Overnight Delivery (1) Federal Express	153.07
10/01/2020	Overnight Delivery (1) Federal Express	94.48
10/13/2020	2 Courier service (670) Special Delivery Service, Inc.	199.00
10/15/2020	Overnight Delivery (1) Federal Express	130.95
10/17/2020	5 Overnight Deliveries (1) Federal Express	173.04
10/20/2020	Filing fee /COURTS/USDC-NY-S (WES Firm CC)	47.00
10/20/2020	754 Filing fee/ STATE BAR TX-CERT OF G (KMC Firm CC)	25.00
10/20/2020	754 Filing fee/ STATE BAR TX-CERT OF G (KMC Firm CC)	200.00
10/21/2020	Filing fee /PACER US DISTRICT CURT WD/AR (WES Firm CC)	100.00
10/21/2020	Filing fee /PACER US DISTRICT CURT WD/AR (WES Firm CC)	47.00
10/22/2020	Airfare Expense - AMERICAN AIRLINES DFW to LAX for PCL (KMC Firm CC)	316.20
10/22/2020	16 Overnight Deliveries (1) Federal Express	654.48
10/23/2020	Philadelphia Records Department (2076)	15.00
10/23/2020	754 Filing fee/ STATE BAR TX-CERT OF G (KMC Firm CC)	25.00
10/23/2020	754 Filing fee/ COURTS/USDC-OK-WD (KMC Firm CC)	47.00
10/24/2020	Filing fee (33) Secretary of State	1.00
10/25/2020	Filing fee (3905) City Hall	256.75

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10/25/2020	Filing fee (3905) City Hall	256.75
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10/25/2020	Filing fee (3905) City Hall	256.75
10/25/2020	Search/BVD*BEENVERIFIED.COM (KMC Firm CC)	24.32
10/26/2020	Postage	7.75
10/26/2020	Courier service (670) Special Delivery Service, Inc.	166.00
10/27/2020	Secretary of State - Certificate of Good Standing (1307) James Stafford	25.00
10/27/2020	Postage	20.20
10/27/2020	Search/WEB*NETWORKSOLUTIONS (KMC Firm CC)	13.85
10/28/2020	Deed Fee in PA/ CITY OF PHILADELPHIA RECORDS (WES Firm CC)	16.95
10/28/2020	U-HAUL OF SANTA MONICA/ (KMC Firm CC)	59.31
10/28/2020	Shipping /THE UPS STORE #6571 (KMC Firm CC)	202.93
10/28/2020	Parking Expense /IMPERIAL PARKING (KMC Firm CC)	8.25
10/28/2020	Overnight Delivery (1) Federal Express	150.77
10/29/2020	Rental Car for KMC and PCL/ HERTZ (KMC Firm CC)	180.97
10/29/2020	Office space /8383 WILSHIRE BLVD (KMC Firm CC)	20.30
10/29/2020	8383 Wilshire Parking Expense (314) Kelly Crawford	20.30
10/30/2020	Lodging Expenses for PCL /MARRIOTT (KMC Firm CC)	230.24
11/04/2020	Overnight Delivery (1) Federal Express	14.14
11/04/2020	2 Overnight Deliveries (1) Federal Express	77.52
11/05/2020	Postage	3.50
11/10/2020	Filing fee (33) Secretary of State	2.00
11/11/2020	Overnight Delivery (1) Federal Express	41.03
11/11/2020	2 Courier services (670) Special Delivery Service, Inc.	173.50
11/11/2020	5 Overnight Deliveries (1) Federal Express	163.31
11/11/2020	Postage	0.50
11/11/2020	Postage	4.80
11/11/2020	Filing fee - E-filing transaction fee/ NATIONWIDE LEGAL, LLC (WES Firm CC)	85.64
11/11/2020	E-filing transaction fee/ NATIONWIDE LEGAL, LLC (WES Firm CC)	85.64
11/13/2020	Postage	5.30
11/13/2020	Postage	0.50
11/16/2020	5 Overnight Deliveries (1) Federal Express	198.14
11/17/2020	Postage	8.45
11/17/2020	Postage	295.75
11/19/2020	Postage	16.90
11/19/2020	Certified Copy of Transcript- Simon Batashvili (3994) Alderson Trustpoint.One	760.50
11/23/2020	Certified Copy of Transcript- Lucas Asher (3994) Alderson Trustpoint.One	1,142.50
11/25/2020	BVD*BEENVERIFIED.COM (KMC Firm CC)	24.32
11/25/2020	E-filing transaction fee/ NATIONWIDE LEGAL, LLC (WES Firm CC)	85.64
12/09/2020	Computerized legal research	351.40

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12/11/2020	Postage	10.90
12/16/2020	Appraisal (3079) Winston Art Group	1,000.00
12/18/2020	Postage	27.00
12/18/2020	Postage	7.00
12/18/2020	Postage	233.50
12/18/2020	Overnight Delivery (1) Federal Express	11.00
	Total Expenses	<u>12,570.49</u>
11/14/2020	Lodging Expenses/ BEVERLY HILLS MARRIOTT (KMC Firm CC)	-230.24
	Total Credits for Expenses	<u>-230.24</u>
	Total Current Services and Expenses	141,419.75
	Previous Balance	\$169,515.58
11/22/2020	Cost payment - thank you - check 1007	-21,737.58
11/22/2020	Fee payment - thank you - check 1006	-125,611.00
	Total Payments	<u>-147,348.58</u>
	Balance Due	<u>\$163,586.75</u>

Past Due Amounts					
<u>0-30</u>	<u>31-60</u>	<u>61-90</u>	<u>91-120</u>	<u>121-180</u>	<u>181+</u>
-230.24	22,167.00	0.00	0.00	0.00	0.00

TERMS: Due and Payable Upon Receipt